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ADMITTED NY & NJ

September 9, 2020

BY ECF

Hon. Sarah L. Cave, U.S.D.J.
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: Jaffee v. Brooklyn Standard Properties, LLC, Case No. 1:19-cv-08102-KMW-SLC

Dear Judge Cave:

My firm represents Plaintiffs in the above-named matter. With consent of opposing counsel, I write respectfully to (a) seek adjournment of the settlement conference currently scheduled for September 23, 2020 to a date in the second half of October and (b) seek adjournment of the discovery deadlines in this case.

The settlement conference previously was scheduled for June 3 and was adjourned by this Court to August 13 and then September 23, each time on consent. Due to difficulties posed by COVID-19, Defendants did not produce their documents (consisting of more than 16,000 documents) until the end of August. Plaintiffs also still are waiting on productions from two key third parties, one of which has indicated it will be sending its documents soon. It is our view that a settlement discussion will be more productive in the second half of October, after Plaintiffs have been able to review Defendants' documents and both parties have been able to review documents produced by third parties.

Also, based on the delays caused by COVID-19 and the FINRA arbitration hearing dates that Plaintiffs' counsel has scheduled in *Izzo v. Voya*, Case No. 16-02322 from November 2-30, 2020 and January 11-29, 2021, I respectfully request that this Court adjust the discovery calendar as proposed below:

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Deadline	Current Date	Proposed New Date
Close of Fact/Expert Discovery	10/31/2020 & 11/30/2020	3/31/2021
Close of All Discovery	1/31/2021	4/30/2021

Respectfully submitted,

s/ Mark S. Pincus

The Court will hold a telephone conference on **Wednesday, September 16, 2020** to discuss the requested extension of the discovery schedule. The parties are directed to call the Court's conference line at 866-390-1828, access code: 380-9799, at the scheduled time

The request to adjourn the settlement conference is GRANTED and Court will issue an amended settlement conference schedule by separate order.

The Clerk of Court is respectfully directed to close the Letter Motion at ECF No. 35.

SO ORDERED 9/10/2020


SARAH L. CAVE
United States Magistrate Judge